

**STATE OF NEW MEXICO  
DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES  
OIL CONSERVATION DIVISION**

**APPLICATION OF COG OPERATING LLC  
FOR COMPULSORY POOLING, LEA  
COUNTY, NEW MEXICO.**

**CASE NO. 20271**

**COG OPERATING LLC'S PRE-HEARING STATEMENT**

COG Operating LLC (OGRID No. 229137) submits the following Prehearing Statement pursuant to the rules of the Oil Conservation Division.

**APPEARANCES**

**APPLICANT**

COG Operating LLC

**ATTORNEY**

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**APPLICANT'S STATEMENT OF CASE**

COG is seeking an order (a) pooling all uncommitted interests in the Bone Spring formation underlying a 640-acre horizontal spacing unit comprised of the W/2 of Section 35, Township 25 South, Range 32 East and the W/2 of Section 2, Township 26 South, Range 32 East Lea County, New Mexico, and (b) dedicating the above horizontal spacing unit to ten proposed initial wells:

- The **Harrier Federal Com #101H** well to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 2 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 35.
- The **Harrier Federal Com #102H** well to be drilled from a surface hole location in SW/4 SW/4 (Unit M) of Section 2 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 35.
- The **Harrier Federal Com #103H** well to be drilled from a surface hole location in NW/4 NW/4 (Unit D) of Section 35 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 2.
- The **Harrier Federal Com #201H** well to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 2 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 35.
- The **Harrier Federal Com #202H** well to be drilled from a surface hole location in NW/4 NW/4 (Unit D) of Section 35 to a bottom hole location in the SW/4 SW/4 (Unit M) of Section 2.
- The **Harrier Federal Com #301H** well to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 2 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 35.
- The **Harrier Federal Com #302H** well to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 2 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 35.
- The **Harrier Federal Com #303H** well to be drilled from a surface hole location in SE/4 SW/4 (Unit N) of Section 2 to a bottom hole location in the NE/4 NW/4 (Unit C) of Section 35.
- The **Harrier Federal Com #304H** well to be drilled from a surface hole location in SW/4 SW/4 (Unit M) of Section 2 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 35.
- The **Harrier Federal Com #305H** well to be drilled from a surface hole location in SW/4 SW/4 (Unit M) of Section 2 to a bottom hole location in the NW/4 NW/4 (Unit D) of Section 35.

The completed intervals for the proposed **Harrier Federal Com #101H, 201H and 303H** wells will each be within 330 feet of the quarter-quarter line separating the W/2 W/2 and the E/2 W/2 of Sections 35 and 2 to allow inclusion of this acreage into a standard

640-acre horizontal well spacing unit. Because the proposed wells will be simultaneously drilled and completed, COG requests an extension of the time period to drill and complete the initial well from 120 days to 365 days.

**APPLICANT'S PROPOSED EVIDENCE**

| <b>WITNESS<br/>Name and Expertise</b> | <b>ESTIMATED TIME</b> | <b>EXHIBITS</b> |
|---------------------------------------|-----------------------|-----------------|
| Matt Solomon – Landman                | Approx. 15            | Approx. 12      |
| John Bertalott – Geologist            | Approx. 15            | Approx. 4       |

**PROCEDURAL MATTERS**

If unopposed, COG anticipates presenting this case by affidavits.

Respectfully submitted,

HOLLAND & HART LLP

By:  \_\_\_\_\_

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